

request for access – meetings with Administration officials – these facts call into question Fowler’s contention that he did not at the time clearly understand that each of these O’Connor meetings related in some way to fund-raising as well as a client’s substantive agenda with the Administration.<sup>275</sup>

O’Connor was not the only person close to the Hudson matter whose conduct subsequent to the Hudson decision suggests that he perceived that Fowler and the DNC would respond favorably to discussion of both contributions and a request for intercession with the Administration. After leaving his post as DOI Chief of Staff, lobbyist Thomas Collier approached the DNC in 1996 to seek Fowler’s assistance for Collier’s client, the Shakopee Mdewakanton Sioux Community.<sup>276</sup>

---

<sup>275</sup>Though Fowler recalled no other O’Connor meetings, evidence reflects that Fowler had at least a third, and possibly a fourth, meeting with O’Connor in 1996 about yet another client from whom O’Connor was soliciting a DNC contribution while simultaneously trying to advance a matter before the Administration – in this case, as in the Hudson matter, a client with interests relating to Indian gaming and the Interior Department. Fowler’s calendar entry for that third O’Connor meeting, on Oct. 14, 1996, states that the meeting would be about O’Connor’s efforts to secure a \$100,000 donation for the DNC. On that date, O’Connor billed the affected client for: "Meeting in Washington and discussion regarding client matters." O’Connor’s handwritten daytimer notes reflect that he intended to review with Fowler a memorandum and data concerning his client and discuss the roles of Interior officials involved in the client’s matter, while also reviewing the status of his efforts to secure a contribution commitment from that client. One week later, O’Connor recorded in his daytimer an entry reading: "Discussion with Don Fowler by telephone . . . regarding status of call to Interior."

<sup>276</sup>Federal laws governing conflicts of interest generally restrict the ability of former officials to lobby federal agencies after leaving government employment, but the provisions of 25 U.S.C. § 450i(j) make these restrictions inapplicable to representation of Indian tribes. Documents produced by Collier and DOI also show that, prior to representing the Shakopee, Collier also sought and obtained from a DOI ethics official a written confirmation that such representation would be legally permissible.